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f/k/a Facebook, Inc.; Facebook Holdings, LLC;  
Facebook Operations, LLC; Meta Payments Inc.  
f/k/a Facebook Payments Inc.; Meta Platforms  
Technologies, LLC f/k/a Facebook Technologies,  
LLC; Instagram, LLC; and Siculus LLC f/k/a  
Siculus, Inc.*

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

### This Document Relates To:

## ALL ACTIONS

MDL No. 3047

Case No.: 4:22-md-03047-YGR

**DECLARATION OF ASHLEY M.  
SIMONSEN IN SUPPORT OF  
DEFENDANTS' REPLY IN SUPPORT  
MOTION TO EXCLUDE GENERAL  
CAUSATION TESTIMONY OF  
PLAINTIFFS' EXPERTS**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026

Time: 8:00 AM

Place: Courtroom 1, 4th Floor

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2 **DECLARATION OF ASHLEY M. SIMONSEN**

3 I, Ashley Simonsen, declare as follows:

4 1. I am a partner with the law firm Covington & Burling LLP, counsel of record for  
 5 Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations,  
 6 LLC; Meta Payments Inc. f/k/a Facebook Payments Inc.; Meta Platforms Technologies, LLC f/k/a  
 7 Facebook Technologies, LLC; Instagram, LLC; and Siculus LLC f/k/a Siculus, Inc. I have personal  
 8 knowledge of the following facts, and, if called as a witness, I could and would testify competently  
 9 thereto.

10 2. Attached hereto as **Exhibit 1** is a true and correct copy of Combined Order on Defendants'  
 11 *Sargon Challenges to Plaintiff's Experts Jeremy Johnson and Kevin Shapiro, M.D., and Defendants'*  
 12 *Combined Motion for Summary Judgment, Landon R. v. Hain Celestial Group, Inc., et al., (Cal. Super*  
 13 *Ct. Dec. 3, 2025).*

14 3. Attached hereto as **Exhibit 2** is a true and correct copy of Maartje Boer et al., *Cross-*  
 15 *national validation of the social media disorder scale: findings from adolescents from 44 countries*, 117  
 16 *Addiction* 784 (2022).

17 4. Attached hereto as **Exhibit 3** is a true and correct copy of Danish Competition and  
 18 *Consumer Authority, Young Consumers and Social Media* (2025).

19 5. Attached hereto as **Exhibit 4** is a true and correct copy of Jacqueline Nesi et al., *Objectively Measured Smartphone Pickups Among Adolescents: Associations With Daily Positive and*  
 20 *Negative Affect and Mindfulness*, *Psych. of Popular Media* (2025).

21 6. Attached hereto as **Exhibit 5** is a true and correct copy of Jolien Trekels et al., *Diverse*  
 22 *social media experiences and adolescents' depressive symptoms: the moderating role of neurobiological*  
 23 *responsivity to rejected peers*, 19 *Soc. Cognitive and Affective Neuroscience* 1 (2024).

24 7. Attached hereto as **Exhibit 6** is a true and correct copy of Ruling Document on  
 25 Defendants' Motion to Exclude Non-Causation Opinions of Arturo Béjar, *Social Media Cases*, JCCP  
 26 5255 (Cal. Super Ct. Nov. 10, 2025).

1 I declare under penalty of perjury under the law of the State of California that the foregoing is true  
2 and correct. Executed on December 5, 2025, in Los Angeles, California.  
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6 DATED: December 5, 2025

7 By: /s/ Ashley M. Simonsen  
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